

EXHIBIT A

2012WY007628

**CRIMINAL COURT OF THE CITY OF NEW YORK
COUNTY OF NEW YORK**

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THE PEOPLE OF THE STATE OF NEW YORK		FELONY
-against-		ADA STUART
1. Royce Coxley (M 27)	ECAB #	212-335-4356
	130626D	
Defendant.		

Detective Mark Woods, shield 00476 of the Vice Enforcement Division, states as follows:

On January 12, 2012, at about 18:00 hours at 335 East 21st Street in the County and State of New York, the Defendant committed the offenses of:

1. PL230.25(1) Promoting Prostitution in the Third Degree
(1 count)
 2. PL230.25(2) Promoting Prostitution in the Third Degree
(1 count)

the defendant knowingly advanced and profited from prostitution by managing, supervising, controlling, and owning, alone and in association with others, a house of prostitution and a prostitution business and enterprise involving prostitution activity by two or more prostitutes, and a business that sells travel-related services knowing that such services include and are intended to facilitate travel for the purpose of patronizing a prostitute, including to a foreign jurisdiction; and the defendant knowingly advanced and profited from prostitution of a person less than nineteen years old.

The offenses were committed under the following circumstances:

Deponent states that he is informed by Undercover Shield number 132, of Manhattan South Vice Unit, that informant responded to an online escort ad on backpage.com advertising prostitution related activities and met with two females at the above location in relation to the ad, whereas female number one, known to the District Attorney's Office, offered informant oral sex in exchange for \$160.00 and female number two, known to the District Attorney's Office, offered informant intercourse for \$160.00. The female identified in the ad was female number one. A search of backpage.com publicly available records revealed a second online ad for female number 2 for escort related activities.

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THE PEOPLE OF THE STATE OF NEW YORK -against-	FELONY ADA STUART 212-335-4356
L. Royce Corley (M:27)	ECAB # 1306260
	Defendant.

Deponent states that both females were arrested and that upon obtaining pedigree information from both females, female number two is 17 years old. Deponent further states that he is informed by the New York City Department of Vital Statistics that a birth certificate obtained for female number two also indicates that she is 17 years old.

Deponent states that he is informed by a custodian of records for backpage.com that a credit card ending 6095 paid for the ad for female number two on January 12, 2012 and that the IP address used to pay for the ad on both January 12, 2012 and January 11, 2012 was 158.57.150.68. Deponent further states that he is informed by informant that that the IP address used to purchase the above mentioned ad for female number one on January 10, 2012 was also 158.57.150.68.

Deponent states that he is informed by a custodian of records for Municipal Credit Union that credit card ending 6095 is registered under the name Royce Corley.

Deponent states that he is informed by American Registry of Internet Numbers that the IP address of 158.57.150.68 belongs to Con Edison in New York and that deponent is further informed by Con Edison that Royce Corley is an employee of Con Edison.

Deponent states that he recovered a booklet from the defendant on January 25, 2012 and that the booklet contained pages of names of girls, with hours associated, and money earned; and that the booklet contained names of the two girls referenced above. Deponent states that in his experience as a Vice Detective this booklet represents evidence that the defendant is supervising and managing a prostitution business.

False statements made herein are punishable as a class A misdemeanor pursuant to section 210.45 of the penal law.

Dependent

Date and Time

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